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June 9, 2022

**BY ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Pierre Girgis  
22 Cr. 06 (KPF)**

Dear Judge Failla:

I write in anticipation of the status conference in the above-captioned case that is scheduled for June 23, 2022, at 11:00 a.m. Without objection from the Government, the defense will ask the Court at the upcoming conference to schedule an ex parte meeting with undersigned counsel to receive Sixth Amendment-protected information and defense strategy bearing on the Government's discovery obligations and a prospective Rule 12 motions schedule. To the extent it is helpful to the Court's planning, I will be on arraignment duty on June 23, 2022, but would (hopefully) be available for such a meeting later in the afternoon of June 23, 2022, after 4:30 p.m. The defense is also available anytime on June 24, June 27, June 30, July 1, July 5, and July 6, 2022.

Respectfully Submitted,



Andrew J. Dalack, Esq.  
Hannah McCrea, Esq.  
Assistant Federal Defenders

Cc: AUSA Elinor Tarlow, Esq.  
AUSA Kyle Wirshba, Esq.

Counsel for Pierre Girgis